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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

16 SIERRA CLUB and CALIFORNIA)
17 COMMUNITIES AGAINST TOXICS,)
18 Plaintiffs,)
19 v.)
20 GINA McCARTHY, in her official capacity as)
21 Administrator of the United States Environmental)
22 Protection Agency,)
23 Defendant.)

Case No: 3:15-cv-01165-HSG

**PLAINTIFFS' AND DEFENDANT'S
STIPULATION TO ENLARGE TIME FOR
REQUESTING ATTORNEYS' FEES AND
COSTS**

STIPULATION

Pursuant to Civil L.R. 6-2, Plaintiffs Sierra Club and California Communities Against Toxics and Defendant Gina McCarthy, Administrator of the U.S. Environmental Protection Agency (“EPA”) stipulate as follows:

1. By decision dated March 15, 2016, the Court entered judgment in favor of Plaintiffs. The Court provided that “Plaintiffs may file any appropriate motion for attorneys’ fees and costs within 30 days.” Dkt. No. 41, at 1; *see also* Civil L.R. 54-1(providing deadline for filing bill of costs); Civil L.R. 54-5 (providing deadline for moving for attorneys’ fees unless Court orders otherwise).

2. Plaintiffs and Defendant wish to attempt to resolve Plaintiffs' claim for fees and costs without the need for further litigation. The parties believe that additional time is necessary to ascertain whether they can reach an agreement as to fees and costs.

3. Therefore, Plaintiffs and Defendant stipulate to enlarge the time for filing a motion for fees and costs so that they may have additional time to discuss an informal settlement of the issue. Plaintiffs and Defendant hereby stipulate to a 60-day extension, which extends the deadline for filing a motion for fees and costs from April 14, 2016 to June 13, 2016. A declaration in support of this stipulation is attached.

4. Plaintiffs attest that concurrence in the filing of this Stipulation has been obtained from counsel for Defendant pursuant to Civil L.R. 5-1(i)(3).

DATED: March 22, 2016

Respectfully submitted,

/s/ Nicholas Morales

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ORDER

Good cause having been shown, the Stipulation is hereby GRANTED. The deadline for Plaintiffs to file any appropriate motion for attorneys' fees and costs shall be extended to June 13, 2016.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 3/22/2016

HAYWOOD S. GILLIAM, JR. *70*
UNITED STATES DISTRICT JUDGE

HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE